

**INTEGRATIVE THERAPEUTICS INC.™**NF Formulas PhytoPharmica
Tyler Encapsulations Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.8386 F: 503.582.0467

ENZYMATIC THERAPY™**&
PHYTOPHARMICA™**

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313

F: 888.570.6460 (Enzymatic)

P: 920.469.9099

F: 920.469.4418 (Phyto)

ENZYMATIC THERAPY*What **Better** feels like.™*

1934 6 0127 12:20

January 16, 2006

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

2006

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Recancostat®	Clinically shown to increase glutathione levels in T-cells of individuals looking for additional immune support.*	L-Glutathione, Reduced, AnthoRedoxin standardized to contain 10% anthocyanins Beet (Beta vulgaris) Root Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Black Currant (Ribes nigrum) Berry Extract, European Elder (Sambucus nigra) Berry Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 1-16-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs, at (920) 406-3608.

Sincerely,

Michael P. Devereux
Chief Operations Officer

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Recancostat 27e

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<u>PRODUCT NAME</u>	<u>STATEMENTS</u>	<u>INGREDIENT(S) TO WHICH THE CLAIM REFERS</u>
Recancostat®	Results in a lasting increase in interferon-gamma (IFN-gamma) production and NK cell activity.*	L-Glutathione, Reduced, AnthoRedoxin standardized to contain 10% anthocyanins Beet (Beta vulgaris) Root Extract, Bilberry (Vaccinium myrtillus) Fruit Extract, Black Currant (Ribes nigrum) Berry Extract, European Elder (Sambucus nigra) Berry Extract

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